IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

TENNESSEE CONFERENCE OF THE)	
NATIONAL ASSOCIATION FOR THE)	
ADVANCEMENT OF COLORED)	
PEOPLE, et al.,)	
)	
Plaintiffs,)	No. 3:20-cv-01039
)	
v.)	Judge Campbell
)	Magistrate Judge Frensley
)	
WILLIAM LEE, et al.)	
)	
Defendants.)	

DEFENDANTS' MOTION TO EXCEED PAGE LIMITATION

Pursuant to Local Rule 7.01(a)(3), the Attorney General, on behalf of the above-captioned Defendants, hereby requests leave to exceed the 25-page brief limit and file the attached Memorandum of Law in support of their Motion to Dismiss. (DE 24).

As grounds for this Motion, undersigned counsel avers that Plaintiffs filed a 45-page complaint on behalf of multiple plaintiffs, including individuals and an organization, and in which they have raised multiple constitutional and federal and state statutory claims regarding Tennessee's felon re-enfranchisement statutes. Defendants require an exemption from Local Rule 7.01(a)(3) in order to address these arguments and in order to raise additional arguments related to Plaintiffs' lack of standing.

For these reasons, undersigned counsel respectfully asks to be excused from the page limitation of Local Rule 7.01(a)(3).

Respectfully submitted,

HERBERT H. SLATERY III
Attorney General and Reporter
/s/ Janet M. Kleinfelter

JANET M. KLEINFELTER (BPR 013889)
Deputy Attorney General
Janet.kleinfelter@ag.tn.gov

ANDREW B. CAMPBELL (BPR 014258) Senior Assistant Attorney General Andrew.campbell@ag.tn.gov

MATTHEW D. CLOUTIER (BPR 036710) Assistant Attorney General Matt.cloutier@ag.tn.gov

KELLEY L. GROOVER (BPR 034738) Assistant Attorney General Kelley.Groover@ag.tn.gov

Office of the Tennessee Attorney General Public Interest Division P.O. Box 20207 Nashville, TN 37202 (615) 741-7403

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been forwarded electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to the parties named below. Parties may access this filing through the Court's electronic filing system.

Danielle Lang Mark Graber Aseem Mulji Campaign Legal Center 1101 14th Street NW, Suite 400 Washington, DC 20005

Phil Telfeyan Natasha Baker Equal Justice Under Law 400 7th St. NW, Suite 602 Washington, DC 20004

Date: December 30, 2020

Charles K. Grant
Denmark J. Grant
Baker, Donelson, Bearman
Caldwell & Berkowitz, P.C.
211 Commerce Street, Suite 800
Nashville, TN 37201

Keeda Haynes Free Hearts 2013 25th Ave. N. Nashville, TN 37208

/s/ Janet M. Kleinfelter

JANET M. KLEINFELTER (BPR 013889)

Deputy Attorney General